

TO: FCC Secretary (Magalie Roman Salas) 11/02/98
Office of the Secretary
Federal Communications Commission
1919 "M" Street, NW (RM222)
Washington, DC 20554

FROM: William F. Harrell (Age 66)
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Subject: 1998 Bienial Review - Amendment of Part 97 of the
Commissions Amateur Service Rules FCC WT Docket 98-143

QUALIFICATIONS FOR COMMENT INPUT++ Nine years military radio operator prior to being licensened as Amateur Radio Operator. Taught at USAF Radio School. Taught approximately 100 Amateur Operators through General Class level. Hold a Radiotelephone Operators License with Radar indorsement. Hold a National Association of Business and Educational Radio Certification. Hold a EXTRA Amateur Radio License. Amateur for 39 years. EXTRA CLASS Accredited Volunteer Examiner. 48 total years as radio operator.

COMMENTS:::::RECOMMENDATIONS:::::

MAJOR PROBLEM: Lack of enforcement of current rules and regulations.

COMMENT: We have created a large pool of no code operators who have no intent of upgrading in license class.

COMMENT: Concur with FCC proposal to reduce license classes from six to four by combining Novice, Technician, and Technician Plus, provided the new license has the entry level requirement of five words per minute code, and has only CW priviledges below 30 MHZ.

COMMENT: The Amateur Radio Band Plan should remain as now exists. The new Technician license should have all priviledges from 50 MHZ and up but only CW priviledges below 30 MHZ.

COMMENT: The new license test should be increased to include much more in depth knowledge of rules and regulations and operating procedures. No less than 100 questions.

COMMENT: Code Requirements: There should be only two code speed requirements: 5 words per minute entry level for the new Technician license and the current 13 words per minute entry level at the General Class level. This would allow all General Class license holders to take element ~~4A/B~~ to upgrade to EXTRA class. There should be NO multiple choice answers for code test. Fill in the blank questions are more appropriate. One minute of perfect copy or seven out of ten fill in the black questions is a good guide.

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COMMENTS: Advanced Class operators should be permitted to administer tests for lower class license. I believe the three person Volunteer Examiner Program as now exists will maintain testing integrity.

COMMENTS: The ARRL Volunteer Examiner Program pertaining to the disabled grants the Volunteer Examiner sufficient leeway to make sure that the handicap applicant is treated justly.

JUSTIFICATION FOR MY THINKING PERTAINING TO CODE: Amateur Radio is a hobby. Communicating by code is very comparable to black and white photography. The art is not dead and this method of communication is very enjoyable. Much is learned in operational procedures of communicating in code. At 5 words per minute the dots and dashes can be counted but at 13 words per minute the operator has broken through the wall of mental inability to count and interpret the character and has become a skilled interpreter of character by sound. As a radio operator in the 1950s most of our radio nets operated at a speed of 15 to 20 words per minute.

From 1955 to 1962 I taught many amateur radio operators utilizing a method which I developed. I entitled it "LETS TALK CODE" and found my methods very successful. Today I pass my methods and tapes on to others.

I am the author of a publication which was printed in many publications (mostly military) which was entitled:
"NO ROOM FOR ERROR".

My input to you is very impartial. I owe no allegiance to any group or publication. Though I am a recent volunteer into the ARRL/VE Program, I am not a member of the ARRL. I admire their program and am convinced that the VE methods have brought integrity back into the licensing process.

The amateur fraternity has suffered from what has happened in Citizen Band Radio. The vulgarity and undisciplined operators are a blight to radio communications. Much of this has now migrated into our Amateur Radio Service. Something must be done to POLICE and ENFORCE discipline upon our airwaves. Having served 41 years in military and federal service I realize the FCC dilemma (MANPOWER).

THANKS FOR LETTING ME HAVE MY SAY!!!!



William F. Harrell
Telecommunications Manager (Retired)
Department of Interior (BLM)

Certified Incident Command Member (CUL)